1 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA 2 3 IN RE BARD IVC FILTERS No. MD-15-02641-PHX-DGC PRODUCTS LIABILITY LITIGATION 4 **AMENDED** SECOND AMENDED MASTER 5 This Document Pertains to SHORT FORM COMPLAINT FOR 6 Member Case C-17-0559-PHX-DGC DAMAGES FOR INDIVIDUAL Danus Bryson Chrisley CLAIMS AND DEMAND FOR JURY 7 TRIAL 8 9 Plaintiff(s) named below, for their Complaint against Defendants named below, incorporate 10 the Master Complaint for Damages in MDL 2641 by reference (Doc. 364). Plaintiff(s) further show 11 12 the Court as follows: 13 1. Plaintiff/Deceased Party: 14 Danus Bryson Chrisley 15 2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of consortium 16 17 claim: 18 Patricia Mclellan Chrisley 19 Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator): 3. 20 21 N/A 22 4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the 23 time of implant: 24 South Carolina 25 26 /// 27 /// 28

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1	10.	Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim				
2		(Check applicable Inferior Vena Cava Filter(s)):				
3						
4			Recovery® V	ena Cava Filter		
5		\boxtimes	G2 [®] Vena Ca	va Filter		
6						
7 8			G2® Express (G2®X) Vena Cava Filter			
9						
10			Eclipse® Ven	a Cava Filter		
11			Meridian® Ve	ena Cava Filter		
12						
13			Denali® Vena	a Cava Filter		
14						
15			Other:			
16	11.	Date of	of Implantation	as to each product:		
17		Septei	mber 18, 2006			
18			·			
19						
20	12.	Count	s in the Master	Complaint brought by Plaintiff(s):		
21		\boxtimes	Count I:	Strict Products Liability - Manufacturing Defect		
2223		\boxtimes	Count II:	Striat Braduata Liability Information Defeat (Eailure to		
24			Count II:	Strict Products Liability - Information Defect (Failure to		
25				Warn)		
26			Count III:	Strict Products Liability - Design Defect		
27						
28			Count IV:	Negligence - Design		

1	Σ	⅓	Count V:	Negligence - Manufacture
2	_	_		
3	Σ	₹	Count VI:	Negligence - Failure to Recall/Retrofit
4	Σ	⅓	Count VII:	Negligence - Failure to Warn
5				
6	Σ	₹	Count VIII:	Negligent Misrepresentation
7	Σ	₹	Count IX:	Negligence Per Se
8				
9	Σ	₫	Count X:	Breach of Express Warranty
10 11	Σ	₹	Count XI:	Breach of Implied Warranty
12			Count 711.	210001 of Imprior Warranty
13	Σ	₫	Count XII:	Fraudulent Misrepresentation
14	D	⅓	Count XIII:	Fraudulent Concealment
15		_	Count 71111.	Tradarent Conceanient
16	Σ	₫	Count XIV:	Violations of Applicable Florida Law Prohibiting Consumer
17				Fraud and Unfair and Deceptive Trade Practices
18	_	-		-
19	Σ	<u>s</u>	Count XV:	Loss of Consortium
20]	Count XVI:	Wrongful Death
21	_	7	Corred WWIII	Complement
22		_	Count XVII:	Survival
23	Σ	₹	Punitive Dama	ages
24	///			
25				
26	///			
27	///			
28				
	I			

1			Other(s):	(please state the facts			
2				supporting this Count in the space immediately below)			
3				supporting this Count in the space infinediately below)			
4							
5			,				
6 7							
8	13.	Inex	Trial demanded	I for all issues so triable?			
9	13.	July	Trial demanded	i for all issues so triable:			
10			Yes				
11			No				
12				Respectfully submitted,			
13				THE NATIONS LAW FIRM			
14				/s/ Howard L. Nations			
15				Howard L. Nations			
16				Texas Bar No. 14823000 3131 Briarpark Dr.			
				Suite 208			
17				Houston, TX 77042			
18 19				ATTORNEYS FOR PLAINTIFF(S)			
20	I hereby certify that on this 9 th day of May, 2017, I electronically transmitted the attached						
21	document to	the Cle		ng the CM/ECF System for filing and transmittal of a Notice of			
22	Electronic Fi	mg.					
23				/s/ Howard L. Nations Howard L. Nations			
24				Howard L. Nations			
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